

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 25-MJ-02526-LOUIS**

UNITED STATES OF AMERICA,
Plaintiff,
vs.

TOMAS NIEMBRO,
Defendant.

UNOPPOSED MOTION FOR EXTENSION OF TIME TO POST BOND

Mr. Tomas Niembro (“Mr. Niembro”), through undersigned counsel, respectfully moves this Court for an extension of time, until the close of business on Wednesday, March 26, 2025, to post the personal surety bond. In support of this motion, Mr. Niembro states the following:

1. On March 15, 2025, Mr. Niembro was arrested on a criminal complaint alleging Conspiracy to Commit Wire Fraud, in violation of 18 U.S.C. § 1349, and Money Laundering, in violation of 18 U.S.C. § 1956(h). [ECF 3; ECF 4].
2. On March 17, 2025, Mr. Niembro appeared before the Honorable Magistrate Judge Lauren Fleischer Louis for his initial appearance. Judge Louis ordered his release on a \$20 million personal surety bond secured by two properties, and an additional \$2 million bond with 10% down and a Nebbia requirement, among other conditions. [ECF 13].
3. Mr. Niembro has until close of business on Monday, March 24, 2025, to post the bond. [ECF 13].

4. Mr. Niembro is in the process of securing the necessary funds, which are being wired from abroad. Due to the international nature of the transfer, there is a possibility the funds may not be available by the current deadline.
5. Counsel has conferred with the government, and the government does not oppose extending the deadline to the close of business on Wednesday, March 26, 2025.

WHEREFORE, Mr. Niembro respectfully requests an extension of time until the close of business on Wednesday, March 26, 2025, to post the bond as previously ordered.

Respectfully submitted,

**STUMPHAUSER KOLAYA NADLER &
SLOMAN, PLLC**

Two South Biscayne Boulevard,
Suite 1600, Miami, FL 33131
Telephone: (305) 614-1400

/s/ Michael B. Nadler
Michael B. Nadler
Fla. Bar No. 51264
mnalder@sknlaw.com

/s/ Juan J. Michelen
Juan J. Michelen
Fla. Bar No. 92901
jmichelen@sknlaw.com

CERTIFICATE OF SERVICE

I HEREBY certify that on March 21, 2025, I filed the foregoing document

with the Clerk of Court via CM/ECF, which will serve all counsel of record through the Notices of Electronic Filing or other authorized means for those not receiving electronic notices.

By: /s/ Juan J. Michelen
Juan J. Michelen